

### REMARKS

The office action and the references cited therein have been carefully considered together with the present application and amendments have been made to the claims to more accurately define the present invention and to emphasize pre-existing differences between the invention as claimed and the prior art of record.

The examiner has rejected claims 1-9, 14 and 22-24 under 35 U.S.C. § 102(e) as being unpatentable over Adamske et al. (hereinafter "Adamske"). The remaining claims 10-13 and 15-21 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Adamske in view of Stewart et al. (hereinafter "Stewart").

Claims 1 and 14 have been amended to incorporate the subject matter of claim 10. With regard to amended claim 1, it is now believed that it is neither anticipated, taught nor suggested by Adamske, applied singularly or in combination with Stewart. Neither Adamske nor Stewart teaches or suggests a personal imaging repository associated with a particular user for storing imaging data comprising digital data capable of being represented as dimensional graphics that is to be accessed by the requested web service and wherein said personal imaging repository is an exchange infrastructure between said imaging data and available web services on the internet.

The examiner identifies column 5, line 65 through column 6, line 8 and column 7, lines 4-9 and 16-27 as teaching a personal imaging repository associated with a particular user for storing imaging data that is to be accessed by the requested web service. However, after reading these identified portions of the specification, they are not believed to describe or suggest such a repository as claimed. Adamske

uses its translation server 24 to convert a printable electronic document to the web server 22 and stores that document on a centralized file server 26. The converted printable electronic document is then processed by a web server 22 to preview files for the user 10 to view. There is no discussion in this identified language that suggests that there is a personal imaging repository associated with a particular user for storing image data and wherein that personal imaging repository is an exchange infrastructure between said imaging data and available web services on the internet.

Adamske uses two separate servers, i.e., web server 22 and file server 26 rather than a single personal imaging repository to perform what it states it performs. The web server appears to function as the exchange infrastructure while the file server 26 stores the imaging data. The identified text in column 7 adds a third component, i.e., database 29 which contains pointers to where the converted document resides on the file server 26 together with information linking each stored document to a user. It also states that this third component, the database 29, also serves as the central repository for all of the electronic documents delivered to various destination printers via the web server 22.

This architecture and functionality is different from the system as claimed in amended claim 1 as well as amended claim 14. As is set forth on page 15, lines 11-20,

[T]he advantage of the architecture of the system claimed in amended claim 1 is that it provides imaging data for printing from an application to a requested web service that allows the imaging data to be later used by other web services. This is because the imaging data is stored on a

personal imaging repository which acts as an exchange infrastructure between the imaging data and available web services. Because the web services are configured to access the personal imaging repository for the imaging data, it is no longer necessary for the imaging data to be uploaded to the requested web service. Rather, once the imaging data is stored in the personal imaging repository, it can be used by any other web services or the user at a later time.

This is unlike the operation of Adamske and Stewart fails to supply this deficiency.

Amended claim 1 also includes the element identified as a capture driver and the claim further defines that as comprising, *inter alia*, a port monitor for directing said imaging data to said personal imaging repository. While the examiner attempts to combine Stewart with Adamske to meet claim 10, the port monitor of Stewart does not teach or suggest directing imaging data to a personal imaging repository as is set forth in claim 1. Reconsideration and allowance of claim 1 is respectfully requested.

The arguments that have been advanced with regard to claim 1 also apply to amended claim 14 and it is therefore believed that amended claim 14 is allowable.

Amended claim 17 is directed to a method for preparing imaging data comprising digital data capable of being represented as two-dimensional graphics for printing from an application located on a computer with a web browser and a capture driver having a printer driver and a port monitor to a requested web service provided by a web service server, wherein the computer is linked to a personal imaging repository having an imaging data store for storing the imaging data and a composition store for storing imaging compositions having links to the imaging data

served as a single unit wherein the method comprises the steps that are set forth. Since neither Adamske nor Stewart have a personal imaging repository as set forth in this preamble, it is believed that this claim is neither taught nor suggested by these references, applied singularly or in combination with one another.

Since the dependent claims pending in the application necessarily include the features of the claims from which they depend, and in addition define other features or functionality, it is also believed that these claims are in condition for allowance.

For the foregoing reasons, reconsideration and allowance of all pending claims in this application is respectfully requested.

Respectfully submitted,

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